

# FELICELLO

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VIA ECF

June 2, 2023

Hon. Victor Marrero  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-VF (S.D.N.Y.)  
Order to Show Cause (Dkt. 421, 425)

Dear Judge Marrero:

We represent Dr. Vincent Wenyong Shi (“Dr. Shi”). We have received the response filed Robert Seiden (the “Receiver”) and Francis “Lilin” Guo on June 1, 2023 (the “Response”) (Dkt. 428-430). We believe it would be helpful to the Court to submit a reply addressing the newly disclosed information and documents filed with the Response and addressing the legal arguments in the Receiver’s memo. In light of the large number of Chinese language documents submitted with the Response, we respectfully request that the Court provide us until June 16, 2023 to submit a reply. Our reply memo of law will be no more than 10 pages in length.

Respectfully submitted,

*/s/ Michael James Maloney*

Michael James Maloney

cc: All counsel of record (via ECF)